

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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ALEC TABAK,

Plaintiff,

vs.

ITSBIZKIT, LLC

Defendant.
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: Index No. 2:17-cv-2962(JS)(SIL)

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: ECF Case

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:**NOTICE OF MOTION FOR
:DEFAULT JUDGMENT**

NOTICE OF MOTION

Pursuant to Fed. R. Civ. P. 55(b)(2) and Local Rule 55.2(b) Plaintiff Paul Martinka hereby moves the Court for default judgment against Defendant Itsbizkit LLC, In furtherance of this motion for default judgment in accordance to 17 U.S.C. §501, et seq., Plaintiff requests (1) statutory damages in the amount of \$20,000 for copyright infringement; (2) statutory damages in the amount of \$10,000 for violation of DMCA Section 1202(b), (3) attorney's fees and costs in the amount of \$2,500.

Pursuant to the Local Rules, this motion is supported by a proposed default judgment order, copy of the complaint, and a copy of Certificate of Default from the Clerk of Court.

Dated: Valley Stream, New York
October 25, 2017

LIEBOWITZ LAW FIRM, PLLC

By: /s/Yekaterina Tsyvkin

Yekaterina Tsyvkin

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